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November 9, 2000

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NOV 9 2000

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Magalie Roman Salas, Secretary
Federal Communications Commission
445-12th St. TW-A235
Washington, DC 20554

Re: American Samoa License, Inc.'s, *Report on E911 Phase II
Implementation*

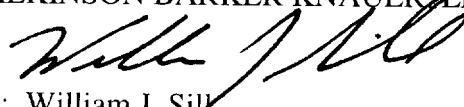
Dear Ms. Salas:

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), American Samoa License, Inc., ("ASLI"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service.

Please do not hesitate to contact the undersigned with any questions you may have at (202)783-4141.

Sincerely,

WILKINSON BARKER KNAUER LLP



By: William J. Silk
Laura A. Schink

Enclosures

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NOV 9 2000

Before the
Federal Communications Commission
Washington, D.C. 20554

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Phase II Implementation Report)	TRS Nos: 1081

To: The Commission

REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. § 20.18(i), American Samoa License, Inc., ("ASLI"), hereby reports its plans for implementing Phase II enhanced 911 (Phase II "E911") service. This report is responsive to the requirements set forth in the Federal Communications Commission's ("FCC") rules and is organized in accordance with the Wireless Telecommunications Bureau's guidance.^{1/}

I. OVERVIEW

A. Background on American Samoa and the Provision of Basic 911 Service

American Samoa License, Inc., ("ASLI"), is an FCC licensed PCS system carrier which provides wireless service on the island of American Samoa. American Samoa is a U.S. territory comprised of a cluster of small islands in the South Pacific, approximately

^{1/} Public Notice, *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*, CC Docket No. 94-102, DA 00-2099 (rel. Sept. 14, 2000).

4,150 miles from San Francisco. The main island has a land mass of 72 square miles and only 64,000 inhabitants. In addition to the challenges posed by American Samoa's location, ASLI will face additional challenges in providing Phase II E911 service in American Samoa.

Recently, in comments filed by ASLI on the furtherance of emergency communications services, including wireless communications, ASLI documented the state of 911 services in American Samoa^{2/}. A copy of these comments is provided as *Attachment I*. To the best of ASLI's knowledge, there is a single local incumbent PSAP on-island, the Police Department in the central business district of Fagatogo. For emergency calls, American Samoans utilizing wireline telephones can choose to either dial 911 and have their calls routed to the Police Dispatcher in Fagatogo, who will then contact the appropriate emergency police, fire, medical or other personnel, or they can directly dial (via a seven-digit telephone number) a specific emergency service provider.

ASLI currently provides wireless callers with 911 dialing so that they can notify the PSAP of their need for emergency services. When ASLI receives a 911 call over its network, that call is translated into a seven-digit number and transmitted to the Police Dispatcher in Fagatogo.

B. Status of Phase I and II E911 in American Samoa

Phase I and Phase II E911 represent significant enhancements and advances in wireless emergency service provision. In Phase I, wireless carriers must provide to the designated PSAP both the telephone number of the 911 callers and the location of the cell

^{2/} See comments filed by ASLI in response to the Federal Communications Commission's *Notice of Proposed Rulemaking*, FCC 00-327 (rel. Aug. 29, 2000) ("Notice") seeking comment on the furtherance of emergency communications services, including wireless communications.

site or base station receiving the call.^{3/} In Phase II, carriers must provide to the designated PSAP the location of 95% of all 911 calls by longitude and latitude.^{4/} However, before CMRS carriers are required to provide E911 the administrator of the designated PSAP must request it, the designated PSAP must be capable of receiving and utilizing the data elements associated with the service, and a mechanism for cost recovery must be in place.^{5/}

ASLI has not received a request for Phase I E911 from the local incumbent PSAP, and ASLI is not certain that there is a designated PSAP in American Samoa as defined in the Commission's rules.

Even if wireless service providers could provide E911 service in American Samoa, there is no PSAP currently able to process and utilize the E911 calls that would be sent from wireless carriers. Despite the obstacles ASLI faces, it supports the Commission's efforts, and ASLI will continue to use its best efforts to work with local officials in American Samoa to coordinate E911 efforts (*See Attachment II*).

II. CHALLENGES FACED BY ASLI IN BRINGING PHASE II E911 TO AMERICAN SAMOA

A. Condition of the Landline System and the PSAP

The landline telephone network in American Samoa is owned by the American Samoa Telecommunications Authority ("ASTCA"). Their network consists of multiple switches including an access tandem (also being used as an interexchange carrier gateway), digital switches, and remote switches with an interoffice connectivity network of analog microwave radio, and copper cables. The existing fiber optic facilities are

3/ 47 C.F.R. § 20.18(e)

4/ 47 C.F.R. § 20.18(j)

5/ Id.

limited. As currently configured, ASTCA cannot support E911. ASTCA's network provides only basic voice and very limited data capability in their local exchange network. Unfortunately, ASTCA's cannot provide SS7 signaling across the entire PSTN network on the main island of Tututula. In addition, ASTCA's Calling Line Identification (CLI) cannot be supported across the entire PSTN network in American Samoa. In the absence of network-wide SS7 signaling, CLI E911 service across the PSTN network cannot be supported. Thus, until ASTCA modernizes its network, E911 service, American Samoa will have neither Phase I or Phase II E911 service.

B. Technological Challenges Of Providing Phase II In A GSM Environment

GSM PCS systems face unique technological challenges. Unlike TDMA and CDMA technologies, GSM is not a fully synchronous system.^{6/} The GSM standards, as defined by the European Telecommunications Standards Institute ("ETSI"), the primary standards body addressing Automatic Location Identification ("ALI") for GSM, were designed for the BSS elements to operate in a plesiochronous manner whereby each functional unit operates on its own self generated clock signal optionally using upstream calibration of gross timing via T1 or E1 circuits. All vendor products comply with this plesiochronous design. Thus, GSM handsets operate in a plesiochronous manner with a self-generated clock that is loosely adjusted by the received base station signal. Unfortunately, plesiochronous and non-synchronous wireless systems do not suit most

^{6/} Other second-generation wireless system technologies, such as IS-95 based CDMA systems do operate in a synchronous manner with all BSS elements synchronized by the UMT reference clock signal available from commercial GPS reception. For systems such as CDMA, the accuracy of the network synchronization makes network-based ALI technologies that meet the FCC E911 Phase II requirements more feasible and implementable.

network based ALI technologies. Therefore, for GSM wireless systems, unique handset based or hybrid ALI solutions must be considered.

C. Market Dynamics In The Wireless Industry Often Dominate Technology Selection, Evolution, and Availability

While GSM presents unique technological challenges, GSM based systems represent, in economic terms, a small percentage of the U.S. wireless market. The dominant operation and usage of GSM is in Europe. Accordingly, the dominant vendors for GSM are based in Europe. Not surprisingly, the needs of the European market are given priority over any other global region particularly for the technology evolution and product development. The FCC E911 Phase II requirements and timetable are unique to the United States, and on a global basis the U.S. GSM industry has a relatively low market share. As a direct consequence, the U.S. is viewed as a relatively minor market for GSM standards' bodies and vendors. Viewed from this economic perspective it is unsurprising that the ALI requirements for FCC E911 Phase II compliance do not receive highest priority.

Furthermore, the fact that ALI technologies are being developed by the GSM community primarily for the European market rather than the U.S. market means that it is not possible to reliably chart a timeline for the development, availability, and performance of ALI technology that will meet U.S. requirements. Further diminishing responsiveness to U.S. needs is the different focus that the European markets place on ALI. While the U.S. is concerned with the public safety applications of ALI, the

European GSM industry to date has been focusing upon ALI's mobile commerce ("m-commerce") applications.^{7/}

Given this unfortunate confluence of technological hurdles and global disinterest, North American wireless carriers that have GSM-based networks, are faced with the challenge of implementing a suitable ALI solution that meets the FCC's requirements in a timely manner. In particular, the main challenge is to obtain the requisite ALI technology from vendors that meet performance requirements in the mandated timeframe. North American GSM carriers have relatively low market power in the global GSM industry, due to their market share. For small North American GSM carriers, such as ASLI, their relative market share within North America further reduces their ability to incent vendors to provide the necessary technology. This unfortunate situation is expected to become more pronounced over the next 12 months simply due to the faster relative growth of the GSM industry in Europe and other major global regions compared to North America.

III. ASLI WILL UTILIZE ITS BEST EFFORTS TO MEET THE FCC'S 2001 DEADLINE

A. ASLI Is Continuing Its Attempt To Open A Dialogue With The PSAP

ASLI recently sent a letter to the Department of Public Safety, in American Samoa, regarding the state of E911 Phases I and II (*See Attachment II*). It is the understanding of ASLI that the Department of Public Safety is the entity responsible for

^{7/} Recently, the European Commission has indicated that it proposes to mandate the provision of location information to emergency services however this proposal is in the initial stages. The European Commission has established a co-ordination group to address this issue and establish working groups. Draft recommendations are not expected from the working groups until late March 2001 however. Clearly, the European effort to introduce ALI to emergency services is well behind the U.S. initiatives.

overseeing the local PSAP. In its letter to the Department of Public Safety, ASLI set forth the information it must receive in order to report its plans for providing E911 to the FCC. To date, ASLI has not received a response. Unfortunately, without adequate communication ASLI cannot accurately assess the status of the implementation of E911 in American Samoa and make plans to further its development. ASLI will pursue this matter with the Department of Public Safety.

B. ASLI Continues To Actively Investigate Its Options

The most prevalent technologies proposed for meeting the ALI requirements for compliance with the FCC E911 Phase II directives are Assisted GPS (“A-GPS”), Enhanced Observed Time Difference (“E-OTD”), and Time Difference of Arrival with Angle of Arrival TDOA/AOA. While all three technologies are proprietary in nature, ASLI is only aware of one technological solution, an E-OTD based solution that has been licensed by multiple network and handset equipment vendors. Cambridge Positioning Technologies Inc., (“CPS”) has developed and licensed an E-OTD solution to several network equipment vendors including Nortel, Ericsson, and Siemens. Handset equipment vendors that have licensed CPS technology include Ericsson, Siemens, and Mitsubishi.

C. At This Point E-OTD Looks The Most Promising, But ASLI Is Examining Other Options

Currently, Nortel provides the GSM network equipment which ASLI uses to provide PCS service in American Samoa. It is a distinct advantage to ASLI to have the option to purchase ALI technology using existing vendor relationships. Thus, ASLI is actively investigating CPS’ E-OTD technology.

E-OTD is also being evaluated by most of the North American GSM carriers. VoiceStream has an ongoing field trial in Houston of the CPS E-OTD technology. ASLI

has been an active participant in this field trial. Also, as part of its activities, the GSM Association of North America has received presentations on the E-OTD field trials directly from both VoiceStream and CPS. ASLI has had representation at these presentations.

ASLI believes that because CPS' E-OTD solution has multi-vendor support and the support of one of the U.S.' largest GSM carriers, it is possible that it could become a de facto industry standard. Further, the existence of multiple vendors with E-OTD equipment should facilitate implementation of an E-OTD solution in small markets such as American Samoa.

At this time, ASLI considers E-OTD to be the most promising solution to meet the ALI requirements. Of the current three ALI technologies, it appears that E-OTD has the highest probability of becoming commercially available to ASLI. This opinion is based upon the active E-OTD trial being held by VoiceStream and CPS, and the multiple vendors that have licensed the CPS technology. ASLI is not aware of any other ALI technology that attempts to meet the FCC E911 Phase II requirements, is compatible with GSM networks or handsets, and is multi-vendor licensed and/or supported. Being a small carrier, ASLI prefers to have the option of multi-vendor sources since ASLI has relatively little leverage with any particular vendor for technology development, pricing, supply, or support.

However, ASLI is loath to commit prematurely to a sole ALI solution and thus has been actively investigating alternatives to determine if other viable options exist. One source that ASLI has turned to is Allen Telecom. Allen Telecom responded to ASLI's inquiry by stating last week that while they do not currently support GSM, it

could if enough interest was generated within the industry. However, Allen Telecom stated that even if there were enough interest generated there would be at best a 50% probability that the technology would be available in the first quarter of 2001.

Furthermore, they would not disclose to ASLI details of the technology Allen Telecom would utilize until ASLI made a firm commitment to purchase equipment from Allen Telecom. They estimated that their TDOA solution would cost approximately \$300,000 for ASLI's GSM network in American Samoa. Given the size of the network and the population base that supports it, that represents a very steep price for a small market. If AOA technology was needed to supplement the TDOA solution, the cost would be significantly higher. Allen Telecom was unable to provide specific cost estimates at this time for the additional cost of implementing AOA.

IV. WHILE ASLI IS CONCERNED THAT A WAIVER MAY BECOME NECESSARY, AT THIS POINT ASLI DOES NOT HAVE ENOUGH INFORMATION TO CONCLUDE A WAIVER IS REQUIRED.

At present ASLI has not been able to receive a firm answer on pricing or availability information from vendors on ALI technology solutions. In fact, ASLI recently received a letter from Nortel stating that there may be problems with implementing the FCC requirements in the timetable outlined by the FCC (*See Attachment III*).

This uncertainty concerns ASLI as Nortel has previously estimated that E-OTD base station equipment would not be "generally available" until third quarter 2001. Even this date might be cutting it a little too close for comfort as ASLI, and other small market carriers, often are often assigned lowest priority by vendors to receive new products. Wireless infrastructure vendors' service their largest customers first, thus, since the European GSM market dwarfs the US market the GSM manufacturers will cater to

European carriers' requirements first.^{8/} In the United States, once ALI technology becomes available, the larger operators will be the first to receive upgrades.

ASLI has been, and will continue to be, active in pursuing its technological options. Through discussions with Nortel, its participation at various presentations and industry groups, ASLI will seek out information concerning the latest technology and marketing developments. ASLI will provide regular updates to keep the FCC informed of its progress and conclusions.

V. CARRIER IDENTIFYING INFORMATION

Licensee Name: American Samoa License, Inc.

Correspondence or other inquiries regarding this report should be addressed to:

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Vice President
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Alpharetta, GA 30022
678-366-9660
Fax: 678-366-9662
lgattis@blueskypcs.com

with a copy to:

William J. Sill
2300 N Street
Suite 700
Washington, DC 20037
202-783-4141
Fax: 202-783-5851

^{8/} This generally applies to any technology development of enhancement. If, for example, European customers have non-ALI requirements that are assigned a higher priority then the vendors will likely focus resources on meeting the highest priority demands.

VI. E911 PHASE II LOCATION TECHNOLOGY INFORMATION

A. Type of Technology

As previously discussed in *Section III.C supra*, based on current technology and vendor representations received in response to multiple requests for information and requests for proposals, ASLI currently intends to test and implement a hybrid or handset-based ALI technology throughout its service territory. While ASLI has not determined a specific vendor, it is actively considering a number of different technologies, including the E-OTD hybrid solution developed by Cambridge Positioning Technologies Inc. However, ASLI reserves the right to change its plan and select an alternative ALI technology, as permitted under the FCC's rules.^{9/}

B. Testing and Verification

As discussed in *Section III.C supra*, current ALI technology performance verification has been performed in vendor and carrier field trials. ASLI participated in one of the two field trials that have been conducted in North America and has been closely following the others. CPS and VoiceStream have conducted an ongoing field trial of E-OTD in VoiceStream's Houston market. ASLI actively participated in Phase I of this field trial earlier this year and receives regular information and updates on the ongoing trial progress.

As the E911 Phase II technology and equipment has not been concretized, ASLI cannot make a final determination as to what technology and equipment it will use. Thus, ASLI cannot finalize its verification plans. However, ASLI intends to verify the performance and operation of any installed ALI solution in American Samoa during

^{9/} See *Third Report and Order*, 14 FCC Rcd. 17388, ¶ 89 (1999).

installation and commissioning of the technology into the existing GSM network. ASLI intends to seek vendor participation in the planning and verification testing stages. As ASLI has not selected a vendor, or vendors, this part of the project is a future activity.

C. Implementation Details and Schedule

ASLI is currently working within the following timeframe for implementation of an ALI solution in American Samoa that will comply with the FCC's E911 Phase II directives:

- 1st Quarter 2001 – Technology evaluation and vendor negotiations
- 2nd Quarter 2001 – Technology selection and vendor selection. Equipment orders placed.
- 3rd Quarter 2001 - ALI installation and commissioning. Verification trials.
- 4th Quarter 2001 – Full operation of the GSM network with E911 Phase II compliance.

It must be noted that ASLI's timeline is dependant on several external factors, which may impact the success or achievements made. For example, the co-operation and readiness of the local PSAP (or equivalent) in American Samoa and the availability date of E911 Phase II GSM equipment can either assure that the deadline is made or missed.

D. PSAP Interface

ASLI intends to implement an ALI solution for its network that will comply with the Telecommunications Industry Association (TIA) issued interim standard, TIA J-STD-036, Enhanced Wireless 9-1-1 Phase II. The current issue was released in June 2000.

ASLI will be seeking vendor compliance with this standard for the PSAP interfaces. This standard specifically addresses the requirements of carriers to report position information to emergency services systems, as mandated by the FCC.

E. Existing Handsets

ASLI has no plans to implement a handset retrofit program to replace existing customer owned non-ALI handsets with ALI compatible handsets. ASLI plans to sell ALI compliant handsets as part of normal sales and new activations. Existing customers will be able to purchase ALI compliant handsets for use with their existing active account.

F. Location of Non-Compatible Handsets

ASLI will continue to review any vendor's plan for providing ALI information compatibility for ALI non-compatible handsets but at this time has no plans to implement a technology solution for non-compatible handsets. ASLI believes that by the time the land line networks and the designated PSAP's facilities have been upgraded, the number of non-compatible handsets will be significantly reduced by the introduction of compatible handsets into the marketplace.

G. Other Information

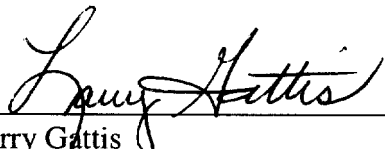
ASLI has not received a request for Phase I or Phase II E911 service. It is ASLI's belief that such requests are unlikely to occur in the foreseeable future. With respect to additional information that will assist the Commission "in monitoring and coordinating the deployment of E911 Phase II in accordance with the timetables set forth in the Commission's rules, ASLI notes that its deployment obligations are contingent on PSAPs being "capable of receiving and utilizing the data elements associated with the service, and having a cost recovery mechanism in place."¹⁰ ASLI has not been notified as to whether the PSAP in its market has met these prerequisites. See Section III. A infra.

^{10/} 47 C.F.R. § 20.18(j).

CONCLUSION

ASLI will continue to use its best efforts to bring Phase II E911 wireless service to American Samoa. As discussed herein, the instant report is submitted pursuant to the requirements set forth in Section 20.18(i) of the FCC's rules. In the event that additional information is requested, ASLI will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information is not publicly disclosed.

Respectfully submitted,

By: 
Larry Gattis
Vice President

November 8, 2000

ATTACHMENT I

RECEIVED

OCT 16 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYBefore the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Implementation of the 911 Act)	WT Docket No. 00-110
)	
The Use of N11 Codes and Other Abbreviated)	CC Docket No. 92-105
Dialing Arrangements)	

To: Federal Communications Commission

**COMMENTS OF AMERICAN SAMOA LICENSE, INC.
IN WT DOCKET NO. 00-110**

American Samoa License, Inc. ("ASLI"), by its attorney, hereby submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") *Notice of Proposed Rulemaking*, FCC 00-327 (rel. Aug. 29, 2000) ("*Notice*")¹ seeking comment on the furtherance of emergency communications services, including wireless communications. ASLI is a corporation formed under the laws of the U.S. Territory of American Samoa for the purpose of operating a personal communications service ("PCS") system in the American Samoa Major Trading Area ("MTA"), consisting of the entirety of American Samoa. As a wireless carrier and a provider of 911 emergency services, ASLI has an interest in this proceeding.

INTRODUCTION

The *Notice* seeks comment on proposed FCC efforts to implement the Wireless Communications and Public Safety Act of 1999 ("911 Act").² Among other things, the 911 Act directs the

¹Concurrently with the release of the *Notice*, the Commission released *Use of N11 Codes and Other Abbreviated Dialing Arrangements*, FCC 00-327, *Fourth Report and Order and Third Notice of Proposed Rulemaking* (rel. Aug. 29, 2000) ("*Fourth R&O*" or "*Third NPRM*").

²Pub. L. No. 106-81, 113 Stat. 1286 (1999), amending 47 U.S.C. §§ 222, 251.

Commission to “encourage and support” the states, territories and other U.S. possessions in developing comprehensive emergency communications so that all jurisdictions offer seamless networks for prompt emergency service.³ Although the 911 Act requires the Commission to “consult and cooperate with State and local officials,” the Commission is not authorized by the 911 Act to “impose obligations or costs on any person.”⁴ Accordingly, the Commission seeks comment on how to facilitate efforts to deploy comprehensive emergency communications systems.⁵

ASLI supports Commission efforts, as discussed herein, to work with state and local officials across the United States and its possessions, including the Territory of American Samoa, to facilitate the provisioning of a comprehensive 911 system, as long as they do not impose costs or obligations. Such efforts are particularly necessary given the current construct of the wireless 911 rules governing “basic” and “enhanced” 911 (“E911”) services by certain wireless carriers, including broadband PCS licensees like ASLI. Specifically, although carriers play an important role in providing E911 service to the public, E911 service will remain unattainable until there is a “designated” Public Safety Answering Point (“PSAP”)⁶ established by a state or locality, and that designated PSAP has the ability to support and process E911 calls. Until the Commission is able to facilitate this, the policies the FCC is trying to further in both the 911 Act and its rules cannot be either fully or expeditiously realized.

³See 911 Act at Section 3(b).

⁴*Id.*

⁵See Notice at ¶ 24.

⁶The “designated PSAP” is defined as the “Public Safety Answering Point (PSAP) designated by the local or state entity that has the authority and responsibility to designate the PSAP to receive wireless 911 calls.” 47 C.F.R. § 20.3.

DISCUSSION

Initially, under the Commission's rules a covered wireless carrier must provide basic 911 service, meaning it must transmit all wireless 911 calls without further location information to a PSAP.⁷ The Commission has clarified that "the designation of the PSAP that should receive wireless 911 calls is a matter for State or local authorities," but "until the relevant State or local governmental entities develop a routing plan for wireless 911 calls within their jurisdiction . . . covered carriers can comply with our rules by continuing to route 911 calls to their incumbent wireless PSAPs."⁸ To the best of ASLI's knowledge, there is a single local incumbent PSAP on-island, the Police Department in the central business district of Fagatogo. For emergency calls, American Samoans utilizing wireline telephones can choose to either dial 911 and have their calls routed to the Police Dispatcher in Fagatogo, who will then contact the appropriate emergency police, fire, medical or other personnel, or they can directly dial (via a seven-digit telephone number) a particular emergency service provider. ASLI provides wireless callers with 911 dialing so that they can notify the PSAP of their need for emergency services. When ASLI receives a 911 call over its network, that call is translated into a seven-digit number and transmitted to the Police Dispatcher in Fagatogo.

The next generation of emergency services are E911 services, which will be implemented in two distinct phases. In Phase I, wireless carriers must provide both the telephone number of the 911 caller and the location of the cell site or base station receiving the call to the "designated" PSAP.⁹ In Phase II, carriers must provide to the designated PSAP the location of all 911 calls by

⁷47 C.F.R. § 20.18(b).

⁸*Compatibility with Enhanced 911 Emergency Calling Systems, Declaratory Ruling*, 14 F.C.C.R. 1969, 1978-79 (1998) (quoting *Compatibility with Enhanced 911 Emergency Calling Systems, Memorandum Opinion and Order*, 12 F.C.C.R. 22665, 22713 (1997)).

⁹47 C.F.R. § 20.18(d).

longitude and latitude.¹⁰ These requirements for enhanced 911 services are applicable, however, only if the administrator of the designated PSAP has requested the services and is capable of receiving and utilizing the data elements associated with the service, and a mechanism for cost recovery is in place.¹¹ ASLI has not received a request for Phase I E911 from the local incumbent PSAP, and ASLI is not certain that there is a “designated PSAP” in American Samoa as defined in the Commission’s rules. Thus, in American Samoa and other similarly-situated areas of the United States, the technology may exist for wireless service providers to provide E911 service, but there is no PSAP currently able to process and utilize the E911 calls that would be sent from wireless carriers. While the FCC has consistently pressed carriers to implement E911 services as early as is technologically feasible, E911 will not become a reality until states and localities budget, construct and operate PSAP facilities capable of handling E911 calls.

Thus, in American Samoa, and elsewhere where a designated PSAP has not been selected or has not yet requested the provisioning of E911 services, further action is required by the state and local governments to make wireless E911 a reality. For this reason, ASLI recognizes the possible benefits to be attained by Commission efforts to encourage and support the states, territories and other U.S. possessions in developing comprehensive emergency communications system, so long as these efforts are carefully tailored and do not impose costs or obligations. For example, the Commission has proposed several information-sharing actions, such as the establishment of focus groups or “round table” discussions, which it believes would help facilitate this process without imposing obligations or costs.¹²

¹⁰47 C.F.R. § 20.18(e).

¹¹47 C.F.R. § 20.18(j).

¹²*See Notice at ¶¶ 25-27.*

Any forums or round table discussions should be designed to include all interested participants, including state and local government representatives, carriers, and emergency services representatives. The Commission's efforts to establish a clearinghouse of information could be particularly worthwhile to smaller states and territories without the same access to resources as their larger counterparts, by allowing them to benefit from the experiences gained by those jurisdictions at the fore of this area, and by learning how to avoid some of the pitfalls they encountered. Finally, any "model" state plans that are developed must be just that: model plans, not mandatory ones. The Commission must recognize that each jurisdiction is unique — American Samoa being a prime example — and there can be no "one size fits all" state plan, only general guidelines.


As 911 service is the foundation upon which E911 services will be built, ASLI is hopeful that the information-sharing actions initiated by the Commission will have as one of their goals the establishment of a neutral forum for interested parties to discuss transition issues presented by E911. Wireless carriers are already subject to Phase I and Phase II rules, however these rules will not translate into E911 services being provided to the public until such time as PSAPs are capable of handling E911 calls.

CONCLUSION

ASLI believes that the FCC can perform a valuable function by serving as a forum for information sharing and that these efforts could expedite the provision of emergency services throughout the United States. For the foregoing reasons, the Commission should adopt the initiatives described herein.

Respectfully submitted,

AMERICAN SAMOA LICENSE, INC.

By: 
Richard Cohen
General Counsel
100 North Point Center East
Suite 320
Alpharetta, GA 30022
(678) 366-0104

Its Attorney

October 16, 2000

ATTACHMENT II



*Fagafaga Daniel Langkilde
General Manager
American Samoa*

October 24, 2000

Honorable Te'o J. Fuavai
Commissioner of Public Safety
American Samoa Government
P. O. Box 1086
Pago Pago, American Samoa 96799

Re: *E911 Phase II Report*

Dear Commissioner Te'o:

American Samoa License, Inc., ("ASLI") is an FCC licensed PCS operator (d/b/a Blue Sky Communications) which provides wireless service in American Samoa. The FCC is requiring all PCS licensees to file a status report by November 9, 2000 of their plans to provide E911 Phase II service. In order to provide the FCC with meaningful information ASLI needs information concerning the status of the implementation of Enhanced 911 ("E911") Automatic Location Identification ("ALI") service in American Samoa, whether there is a Designated Public Safety Answering Point ("PSAP") in American Samoa, and what the PSAP's schedule is to become Phase I and Phase II compliant.

In many areas there is a central designated PSAP into which 911 calls are channeled. ASLI has learned that the Department of Public Safety ("Department") was responsible for 911 efforts in the Territory. ASLI has not been able to determine whether there is a "Designated PSAP"¹ or what plans there are for the provision of E911 service in American Samoa.

It is ASLI's understanding based upon informal inquiries that at this time there is one PSAP at the Police Department in Fagatogo. (We are sending a similar letter to find out what the Police Department's E911 plans are.) Further, we have not received a request for Phase I E911 service and it is our belief that such a request will not occur

¹ The "Designated PSAP" is defined as the "Public Safety Answering Point (PSAP) designated by the local or state entity that has the authority and responsibility to designate the PSAP to receive wireless 911 calls." 47 C.F.R. § 20.3.

*An American Samoa Telecom, LLC / American Samoa License, Inc. Company
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dlangkilde@bluesky.as*


within the foreseeable future. In fact, ASLI has previously had informal conversations where it has been told that there is currently no funding available for SS7 signaling which is a precursor to providing both Phases I and II. ASLI is also not aware of any funds that have been allocated to purchase the necessary E911 system(s) for the PSAP.

Without your assistance, ASLI is concerned that it will not have sufficient information to meaningfully respond to the FCC's directive to file a E911 Phase II Report. Please provide me answers to the following by Friday, October 27, 2000:

- Is there a Designated PSAP? If so, please provide its name.
- Is your Department in charge of the planning and implementation of E911 Phase I and Phase II for the entire Territory of American Samoa or is the Police Department in Fagatogo responsible for planning and implementation?
- Will Phase I be offered or will there be a transition straight from 911 to Phase II?
- If Phase I will be offered, when will the landline network and the PSAP be capable of handling Phase I traffic? When do they plan to request Phase I service from ASLI?
- Has the PSAP received funds for modifications necessary to process Phase I traffic? If not, when does it plan to request such funds?
- If Phase II will be offered, when will the landline network and the PSAP be capable of handling Phase II traffic? When do they plan to request Phase II service from ASLI?
- Has the PSAP received funds for modifications necessary to process Phase II traffic? If not, when does it plan to request such funds?

In advance, thank you for your assistance in this matter. By discussing these matters ASLI and your Department will be able to work together to more expeditiously provide E911 services to the people of American Samoa.

Sincerely,



Fagafaga Daniel Langkilde
General Manager

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ATTACHMENT III

October 26, 2000

Blue Sky Communications
100 North Point Center East, Suite 300
Alpharetta, Georgia 30022
Attn: Mr. Larry Gattis

Dear Larry,

Nortel Networks is providing the following information to all DMS-MTX and DMS-MSC switch customers in order to allow ample time for our customers to properly address the E911 Phase II compliance schedule. We hope that the delivery of this information will be useful and will enable customers to factor the enclosed information into the E911 report that the customers must file with the FCC by October 1, 2000.

The FCC Third Report and Order, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, RM-8143, requires carriers to deploy Phase II capability within six months after a Public Safety Answering Point (PSAP) request, but no sooner than October 1, 2001. The PSAP must be able to use the Phase II location information for the request to be binding upon a carrier. For more information please refer to the FCC web site at: <http://www.fcc.gov/e911/>

The FCC Phase II rules create the potential that a wireless carrier could be required to commence delivery of location information to multiple PSAPs at the same time. The recently launched APCO Project 38 initiative increases the likelihood of multiple, simultaneous requests for location information by urging aggressive PSAP implementation of E911 Phase II. Given enough simultaneous requests for location information from the PSAPs, carriers may not be able to respond to the requests within the required FCC deadlines (Network solution: 47 CFR20.18 (f); Handset solution: 47 CFR20.18 (g)(2)). Correspondingly, Nortel Networks can only accommodate a limited number of simultaneous carrier requests for E911 Phase II switch provisioning prompted by PSAP requests for E911 Phase II location information for October 2001. We wish to work with our customers so that jointly we can maximize test and provisioning time for E911 Phase II services.

Compounding the potential problems created by multiple concurrent requests for location information is the lateness of the development of the E911 handset and core network standards. To assure equipment compatibility between different manufacturers, standards must be followed. Generally, twelve to eighteen months are necessary to design and test a solution in accordance with a published standard. The J-STD-036 standard for the core network architecture necessary to support any location technology adopted by a carrier was only approved for publication in July 2000 and needs further refinement to support analogue handsets with GPS capability. The SAMPS standard to support TDMA handset assisted solutions is projected to be finalized and published by the end of 2000. In summary, because the overall standards are not yet complete, our schedules for completion of current development work as detailed below may change.

Nortel Networks is diligently developing solutions for its MSC and MTX platforms. For the MTX platform, Nortel Networks projects a limited number of VO shipments for the generic software release providing the core J-STD-036 network standard functionality in mid-year 2001 and with general availability in 4Q 2001. For the Nortel GSM platform, generic software release GSM 13 will be generally available in 2Q 2001. The corresponding GSM base station software to support a handset-assisted solution is scheduled for availability in release 13.3 with general availability in 3Q 2001.

Nortel Networks intends to share the information in this letter to the FCC and discuss possible solutions including some variant of the flexible deployment process implemented in the roll out of CALEA.

If you should have any questions, please contact your Nortel Networks account representative.

Sincerely

Barry E. Farr
Account Manager, Nortel Networks